

To: FCC

August 15, 2001

From: John P. Riegel, III
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Re: Comments on RM-10209

I would like to support the FCC's consideration of frequency allocations in the area of 5 Mhz. I currently serve as the City of San Antonio Emergency Communications Officer. In this role, I must be prepared to stay in contact with communities along the Texas coast. In the event of a hurricane striking areas such as Corpus Christi, it is imperative that communications be maintained.

Currently, this is accomplished via SSB communications on the 40 and 80meter bands as well as VHF/UHF linked systems. Historically, the HF bands have been the most reliable. However, they are not 100%. In a recent test with Corpus Christi using PSK-31 on 40 meters we went from 100% copy to no signal in a matter of minutes. It was nearly an hour before we were able to reestablish direct contact. A relay via a Houston station was necessary during the interim.

It is my understanding that preliminary tests have shown the proposed 60meter band to offer a higher probability of maintaining a direct link. Our experience shows that direct communication is far superior to relays. Therefore, I would strongly endorse the new allocation. In conjunction with this, I would ask that the plan allow for PSK and similar modes to be used along with voice. Tests conducted between San Antonio and Corpus Christi show that the ability to switch between voice and PSK is a very effective way to transmit messages. Unfortunately, the 40 and 80 meter plans require systems to be retuned substantially to make the switch. This problem should be avoided on the new band.

If desired, I could arrange for tests to be run between stations in the San Antonio area and several of the Texas coastal regions using both SSB and PSK on the proposed band. I appreciate your consideration of the proposed allocation. I believe that implementing this band will further enable amateur operators to provide emergency communication services.

Sincerely,
J. P. Riegel, III
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